

DOCKETED

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Project Title:	Executive Order B-48-18 Workshops
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Document Title:	Commercial Fleets and Technology Providers Comments
Description:	Comments - Please Allocate at Least 10% of ARFVTP EO B-48-18 Funding to ZEV Infrastructure for MHDVs
Filer:	System
Organization:	Ryan Schuchard from CALSTART, on Behalf of Commercial Fleets and Technology Providers
Submitter Role:	Public
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Comment Received From: Ryan Schuchard

Submitted On: 5/14/2018

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Please Allocate at Least 10% of ARFVTP / EO B-48-18 Funding to ZEV Infrastructure for MHDVs

Additional submitted attachment is included below.



To: The Honorable Commissioner Janea Scott, California Energy Commission
 From: Ryan Schuchard, CALSTART, on Behalf of Commercial Fleets and Technology Providers
 Date: May 14, 2018
 Re: Please Allocate at Least 10% of ARFVTP Executive Order B-48-18 Funding to ZEV Infrastructure for Medium- and Heavy-Duty Vehicles

Dear Commissioner Scott,

We the undersigned commercial vehicle operators; providers of zero-emission buses, trucks, and charging equipment; and concerned organizations respectfully ask you to allocate a significant share of funding in the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP) Investment Plan for 2018-2019 to infrastructure for medium- and heavy-duty zero-emission vehicles (MHD ZEVs).

Specifically, we request an investment of at least \$28 million, or about 10% of the total allocation from the total proposed budget of \$277.5 million for FY 2018-19, for MHD ZEV infrastructure.

Conventional medium- and heavy-duty vehicles (MDHVs) are California's most concentrated source of greenhouse gas emissions, comprising only around 3% percent of vehicles, but causing around 23% percent of greenhouse gas emissions and most of the air pollution from transportation.

While California has made progress in deploying light duty zero emission vehicles (ZEVs), the MHDV sector lags, in part because it faces persistent challenges with infrastructure that are unique to large vehicles and commercial fleets. Those challenges include:

1. Charging loads that are orders of magnitudes higher than with passenger cars, necessitating sophisticated management equipment and techniques including onsite renewables and storage;
2. No clear template for fleet-wide deployment systems and strategies, or interoperable charging protocols;
3. A lack of electricity rates that incentivize MDHV adoption, which persists in part because a lack of validated charging systems limit the availability of “use case” data to base them on;
4. A lack of effective strategies for charging MHD electric vehicles that serve varied, remote, and non-return-to-base routes, and strategies for responding if expected power input fails;
5. A lack of familiarity and understanding about charging best practices for wired and wireless charging that serve varying types of fleet operations and vehicle classes and configurations;
6. For larger fleets, the expense associated with an expansive physical footprint that is needed to charge dozens or even hundreds of vehicles;
7. In the case of hydrogen vehicles, the general expense of developing and implementing fueling stations; and
8. The production and distribution cost of renewable hydrogen for transportation applications.

An investment of at least \$28 million to address these MHD-specific challenges for ZEV infrastructure would support the Governor’s recent Executive Order, B-48-18, which calls for 250,000 electric vehicle charging stations by 2025. It would also provide an opportunity to move the industry towards more maturity and put MHDs on track to make California succeed in achieving its climate goals.

To date, the Commission has been a driving force leading California to deploy MHD ZEVs, which include around 180 zero emission buses on the road now and significant advances in zero-emission trucks under way. As such, the Commission is a natural agency to lead a major infrastructure portfolio for MHD ZEVs, which would complement vehicle incentive funding from the California Air Resources Board and Air Districts, and the rate-basing of targeted grid upgrades to support MHD electric vehicle loads under the California Public Utilities Commission.

The Commission’s investments in MHD ZEV infrastructure could provide tremendously positive benefits statewide to disadvantaged communities, which are most impacted by pollution near highways, ports, and industrial hubs where MHDV ZEVs have the potential to replace dirty diesel vehicles. Such investments could also give a critical push needed to build on progress to date and help zero-emission buses and trucks start entering California roads in significant numbers.

We thank you for your continued leadership and support.

Warmly,

Chris Andrichak, Director of Management and Budget, **AC Transit**

Diana Kotler, Executive Director, **Anaheim Resort Transit**

Len Engel, Executive Director and CEO, **Antelope Valley Transit Authority**

Moses Stites, General Manager, **Fresno Country Rural Transit Agency**

Ernie Crespo, Director of Transit, **City of Gardena**

Corinne Ralph, Chief of Transit Programs, **Los Angeles Department of Transportation**

Hunter Harvath, Assistant General Manager, **Monterey-Salinas Transit**

James Cade, Vice President of Fleet Services, **Ruan Transport Corporation**

Donna DeMartino, Chief Executive Officer, **San Joaquin Regional Transit District**

Lauren Skiver, CEO, **SunLine Transit Agency**

Bruce DD Mac Rae, Vice President, **UPS**

Larry Brennan, President and CEO, **Advanced Vehicle Manufacturing**

Steve Trichka, Vice President, **BAE Systems**

Nicolas Pocard, Director of Marketing, **Ballard**

Zachary S. Kahn, Director of Government Relations, **BYD**

James Chen, Vice President and General Counsel, **Chanje**

Jason France, President and Founder, **ClipperCreek, Inc.**

Jean-Baptiste Gallo, Product Manager, **Efficient Drivetrains**

Rob Del Core, Director, Fuel Cell Power Systems & Hydrogen Fuel Infrastructure, **Hydrogenics**

Brett Gipe, Chief Commercial Officer, **First Priority GreenFleet**

Andrew Daga, Chairman and CEO, **Momentum Dynamics**

Urvi Nagrani, Director of Business Development, **Motiv Power Systems**

Joe Dalum, President, **Odyne Systems**

Emad Fakhoury, CEO, **Phoenix Motorcars**

Kent Leacock, Sr. Director Government Relations and Public Policy, **Proterra**

Dakota Semler, CEO, **Thor Trucks**

Michael Simon, President & CEO, **TransPower**

Dawn Fenton, Director, Sustainability and Public Affairs, **Volvo Group North America**

Christine Smith, Vice President of Sales and Marketing, **Zenith Motors**

Richard Battersby, Executive Director, **Clean Cities Coalition – East Bay**

Keith Leech, President, **Clean Cities Coalition – Sacramento**

Bill Magavern, Policy Director, **Coalition for Clean Air**

Ryan Schuchard, Policy Director, **CALSTART**